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September 19, 2016

VIA U.S. MAIL AND E-MAIL

Attn: Ashley Peters
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114
E-mail: Ashley.Peters@waterboards.ca.gov

Re: Comments on the Grassland Drainage Area GAR

Dear Ms. Peters,

Please accept these comments on behalf of the Grassland Water District and Grassland Resource Conservation District (GWD) regarding the Grassland Drainage Area Groundwater Quality Assessment Report (GAR) submitted by the Grassland Basin Drainage Steering Committee. The GAR is required by Central Valley Regional Water Quality Control Board (CVRWQCB) General Order R5-2015-0095, which covers discharges to groundwater from irrigated agricultural land within the 97,400-acre Grassland Drainage Area. This includes more than 5,300 irrigated acres in the San Joaquin River Improvement Project (SJRIIP) drainage reuse area, located immediately southeast and upslope from both GWD and the larger Grasslands Ecological Area wetland complex.

GWD frequently partners with growers and water districts within the Grassland Drainage Area, and believes that cooperation and communication with its neighbors is an essential and effective way to ensure both the ecological integrity

of the Grasslands Ecological Area and the long-term viability of irrigated agriculture. GWD's primary interest in the GAR is in the development of a more robust groundwater monitoring plan for the SJRIP area, which borders GWD's wetlands and water delivery channels.

The need for a comprehensive monitoring plan for the SJRIP is particularly timely now, in light of several recent developments: (1) expansion of the drainwater reuse area to the west of Russell Avenue; (2) initiation of sediment removal in the lower San Luis Drain, and land application of those removed sediments within the SJRIP area; and (3) a pending agreement between the United States and water districts that serve the Grassland Drainage Area, which would place full responsibility on the water districts to manage drainwater within their boundaries. The attached copy of GWD's comment letter on the pending drainage agreement also discusses the need to develop a monitoring plan to protect the Grasslands Ecological Area from the impacts of current and proposed drainage management activities in the area.

GWD supports the proposed designation of the SJRIP area as a High Hydrogeologic Vulnerability Area (HHVA). This area has high potential to impact water quality and groundwater wells in its vicinity, including on wetlands that are within GWD and immediately downslope from the SJRIP area. The constituents of greatest concern to GWD are selenium and total dissolved solids (TDS).¹

GWD does not believe that the GAR includes enough groundwater monitoring wells and data within the SJRIP area to effectively establish or analyze water quality and trends over time. Our review of GAR Figures 7-1 through 7-12 indicates that there are large gaps in both the number of groundwater wells monitored and the data collected, including an apparent lack of monitoring for selenium in SJRIP area wells.

We recommend and request that GWD be consulted during the development of a groundwater monitoring plan for the SJRIP area. The monitoring plan should include monitoring wells both adjacent to and inside the boundaries of the adjacent GWD. Landowners within GWD are increasingly concerned about diminishing groundwater quality and the potential for down-gradient movements of salts and

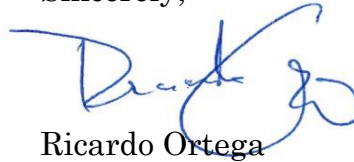
¹ GWD strongly believes that land application of sediments removed from the San Luis Drain to an HHVA area such as the SJRIP area poses an unacceptably high potential for further degradation of water quality.

selenium from the SJRIP area. If such impacts are identified, GWD can work with the Steering Committee to develop adaptive measures, such as curtailment or relocation of drainage water applications, and installation of a tile drain system and/or shallow wells to intercept and redirect poor quality groundwater from migrating into the Grasslands Ecological Area.

GWD believes that many of the needed improvements in groundwater monitoring and management can be achieved in the upcoming year through the Steering Committee's development of a workplan for the trend monitoring program that is required under General Order R5-2015-0095. Required objectives include a determination of current groundwater quality conditions, development of long-term water quality information to evaluate the regional effects of irrigation practices, and the design of an effective groundwater monitoring network.

Thank you for the opportunity to provide these comments on the GAR. We look forward to further engagement with the CVRWQCB and the Steering Commission on matters that affect the long-term ecological health of the Grasslands Ecological Area.

Sincerely,



Ricardo Ortega
General Manager,
Director of Policy &
Governmental Affairs